Finds#: KY0001018548

Natural Resources and Environmental Protection Cabinet Kentucky Department for Environmental Protection Division for Air Quality

PERMIT

Attn: Will May HUISH DETERGENTS, INCORPORATED 385 Southwood Court BOWLING GREEN, KENTUCKY 42101

RE: Operation of a Detergent Manufacturing Plant located on Southwood Court, Bowling Green

Pursuant to your application which was determined to be complete by this office on February 2, 1996, the Natural Resources and Environmental Protection Cabinet issues this permit for the construction/operation of the equipment specified herein in accordance with the plans, specifications, and other information submitted with your application. This permit has been issued under the provisions of KRS Chapter 224.10-100 and regulations promulgated pursuant thereto and is subject to all conditions and operating limitations contained herein. Issuance of this permit does not relieve the permittee from the responsibility of obtaining any other permits, licenses, or approvals required by this Cabinet and/or other state, federal, and local agencies.

POINT OF EMISSION AFFECTED FACILITY CONDITIONS

I. PLANT UTILITIES

01 (-)

Boiler #1

(Natural gas fired)

- 1. Heat input shall not exceed 12.555 mmBTU/hr.
- 2. Particulate emissions shall not exceed 0.0055 lb/mmBTU and 0.305 TPY.
- 3. SO₂ emissions shall not exceed 0.485 lb/mmBTU and 26.7 TPY.
- 4. Opacity of visible emissions shall not exceed 20%.

No deviation from the plans and specifications submitted with your application or the conditions specified herein is permitted, unless authorized in writing by the Division for Air Quality. Violations of the terms and conditions contained herein shall be grounds for the Department to seek revocation of this permit. All rights of inspection by the representatives of the Division for Air Quality are reserved. Responsibility for satisfactory conformance with all Air Quality Regulations must be borne by the permittee.

PERMIT NUMBER: F-96-007	Issued this	day of	1996
FILE NUMBER: 105-3960-0100			
REGION: South Central	John E.	Hornback, Director	

COUNTY: Warren Robert W. Logan

SIC CODE: 2841/2842 Commissioner

DEP7001 (1-93)

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POINT OF EMISSION	AFFECTED FACILITY	<u>CONDITIONS</u>
02 (-)	Boiler #2 (Natural gas fired)	 Heat input shall not exceed 8.369 mmBTU/hr. Particulate emissions shall not exceed 0.0056 lb/mm BTU and 0.204 TPY. Sulfur dioxide emissions shall not exceed 0.478 lb/mmBTU and 17.53 TPY. Opacity of visible emissions shall not exceed 20%.
II. LIQUID RAW MATERIAL S	TORAGE AND LIQUID PROCESSI	NG UNIT:
03 (01)	30,455 gal Sulfonic Acid 89% Storage tank.	
04 (02)	30,455 gal Sodium Silicate Storage tank.	
05 (03)	30,455 gal Sur.N-85 Storage tank.	See General Condition 24.
06 (04)	20,303 gal Caustic soda Storage tank.	
07 (05)	20,303 gal Waste Water Storage tank.	
(06) (08)	14,100 gal Recycle tank 14,100 gal Deionized water	
(09)	Storage tank. 14,100 gal Soft Water Storage tank.	
08 (10)	14,100 gal Ether Sulfate Storage tank.	See General Condition 24.
09 (15)	14,100 SXS-40 Storage tank.	See General Condition 24.

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POINT	OF EMISSION	AFFECTED FACILITY	CONDITIONS
10	(17)	14,100 gal Fabric Softener Storage tank.	
11	(19)	14,100 gal TEA Storage tank.	
12	(20)	14,100 gal Sulfonic Acid 96% Storage tank.	
13	(22)	14,100 gal Neodol 25-7 Storage tank.	
14	(24)	14,100 gal Fatty acid Storage tank.	
15	(25)	14,100 gal Pine Oil Storage tank.	
16	(26)	14,100 gal Fabric Softener tank.	
17	(37)	14,100 gal gly.ether Storage tank.	See General Condition 24.
18	(36)	14,100 gal IPA Storage tank.	See General Condition 24.
19	(-)	14,100 gal Poly Acrylate Storage tank.	See General Condition 24.
20	(29) (28) (35) (32)	Mixer # 1 Mixer # 2 Mixer # 3 Mixer # 4	See General Condition 25.
21	(31) (30)	Pre-mixer #1, 1200 gal Pre-mixer #2, 1700 gal	

POINT	OF EMISSION	AFFECTED FACILITY	<u>CONDITIONS</u>
III. LIQ	UID FINISHED PRODUCT S	STORAGE	
22	Finished product Storage tanks. (01) (02) (03) (4A) (4B) (5A) (5B) (06) (07) (09) (10)	Three 12,300 gal tanks. Four 7,000 gal tanks. Two 8,000 gal tanks. Two 9,000 gal tanks.	
IV. POV	WDER PROCESSING UNIT		
23	(DC14)	Storage bin	 The processing rate shall not exceed 20,000 lb/hr and 87,360 TPY. Particulate emissions shall not exceed 0.111 lb/hr and 0.487 TPY. Opacity of visible emissions shall not equal or exceed 20%.
24	(DC15)	Storage bin	 The processing rate shall not exceed 14,000 lb/hr and 61,152 TPY. Particulate emissions shall not exceed 0.078 lb/hr and 0.341 TPY. Opacity of visible emissions shall not equal or exceed 20%.
25	(DC16)	Sodium Perborate Storage bin	 The processing rate shall not exceed 3,000 lb/hr and 13,104 TPY. Page <u>4</u> of <u>18</u> pages

POINT	OF EMISSION	AFFECTED FACILITY	<u>CONDITIONS</u>
			 Particulate emissions shall not exceed 0.017 lb/hr and 0.073 TPY. Opacity of visible emissions shall not equal or exceed 20%.
26	(DC17)	Sodium tri poly Phosphate Storage bin	1. The processing rate shall not exceed 11,200 lb/hr and 48,922 TPY.
			2. Particulate emissions shall not exceed 0.062 lb/hr and 0.273 TPY.
			3. Opacity of visible emissions shall not equal or exceed 20%.
27	(DC18)	Zeolite Storage bin	1. The processing rate shall not exceed 10,000 lb/hr and 43,680 TPY.
			2. Particulate emissions shall not exceed 0.056 lb/hr and 0.244 TPY.
			3. Opacity of visible emissions shall not equal or exceed 20%.
28	(DC19)	Na ₂ SO ₄ Storage bin	1. The processing rate shall not exceed 3,000 lb/hr and 13,104 TPY.
			2. Particulate emissions shall not exceed 0.017 lb/hr and 0.073 TPY.
			3. Opacity of visible emissions shall not equal or exceed 20%.
29	(DC20)	NaCl Storage bin	1. The processing rate shall not exceed 22,000 lb/hr and 96,096 TPY.
			 Particulate emissions shall not exceed 0.122 lb/hr and 0.536 TPY.
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POINT	OF EMISSION	AFFECTED FACILITY	CONDITIONS
V. HIG	H-SUDS BASE PRODUCTION	ON	3. Opacity of visible emissions shall not equal or exceed 20%.
A. Slur	ry Manufacturing		The production rate of slurry shall not exceed 35,400 lb/hr and 155,052 TPY.
30	(DC22)	Sod. tri poly phosphate Feeder bin	 Particulate emissions shall not exceed 0.111 lb/hr and 0.487 TPY. Opacity of visible emissions shall not equal or exceed 20%.
31	(DC23)	Soda ash 260 Feeder bin.	 Particulate emissions shall not exceed 0.02 lb/hr and 0.088 TPY. Opacity of visible emissions shall not equal or exceed 20%.
32	(DC26)	Na ₂ SO ₄ Feeder bin	 Particulate emissions shall not exceed 0.0016 lb/hr and 0.007 TPY. Opacity of visible emissions shall not equal or exceed 20%.
33	(DC28)	NaCl Feeder bin	 Particulate emissions shall not exceed 0.054 lb/hr and 0.237 TPY. Opacity of visible emissions shall not equal or exceed 20%.
34	(DC33)	CMC+ Feeder bin	 Particulate emissions shall not exceed 0.0017 lb/hr and 0.0075 TPY. Opacity of visible emissions shall not equal or exceed 20%.

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<u>POINT</u>	OF EMISSION	AFFECTED FACILITY	<u>CONDITIONS</u>
35	(DC35)	Tinopal Feeder bin	 Particulate emissions shall not exceed 0.0006 lb/hr and 0.0025 TPY. Opacity of visible emissions shall not equal or exceed 20%.
36	(DC6)	High-suds fine Recycle bin	1. See General Condition 27.
		Sodium Silicate feeder tank	
		Sulfonic acid feeder tank	
		Caustic feeder tank	
		Water feeder tank	
37	(WS1)	Crutcher (Main Mixer)	1. See General Condition 29.
36	(DC6)	Booster Mixer	1. See General Condition 27.
B. SPR	AY DRYING		The production rate of spray dried product shall not exceed 35,400 lb/hr and 155,052 TPY.
37	(WS1)	Spray Tower	1. See General Condition 29.
	(C-1)	Cyclone Product Collector	
36	(DC6)	High-suds clean out Bin	1. See General Condition 27.
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<u>POINT</u>	OF EMISSION	AFFECTED FACILITY	<u>CONDITIONS</u>
36	(DC6)	Drum Mixer	1. See General Condition 27.
36	(DC6)	Cage Mill feeder	1. See General Condition 27.
38	(DC1)	Cage Mill	 Particulate emissions shall not exceed 3.83 lb/hr and 16.79 TPY. Opacity of visible emissions shall not equal or exceed 20%.
VI. HIC	GH SUDS FINAL PRODUCT	LINE	The production rate of High Suds product shall not exceed 35,400 lb/hr and 155,052 TPY.
39	(DC29)	Sodium Perborate Feeder bin	 Particulate emissions shall not exceed 0.0019 lb/hr and 0.0085 TPY. Opacity of visible emissions shall not equal or exceed 20%.
36	(DC6)	Elevator # 2	1. See General Condition 27.
36	(DC6)	High suds base feeder bin	1. See General Condition 27.
36	(DC6)	High suds off quality Feeder bin	1. See General Condition 27.
36	(DC6)	High suds drum Mixer	1. See General Condition 27.
36	(DC6)	Elevator # 7	1. See General Condition 27.
40	(DC24)	Sodium Sulfate day tank	 Particulate emissions shall not exceed 0.0016 lb/hr and 0.007 TPY. Opacity of visible emissions shall not equal or exceed 20%.
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POINT	OF EMISSION	AFFECTED FACILITY	<u>CONDITIONS</u>
VII. LO	W-SUDS BASE PRODUCTI	ON	
A. Aggl	omeration Process		The production rate of dried Agglomerated product shall not exceed 40,000 lb/hr and 175,200 TPY.
		Sodium Silicate feed tank	
		Tinopal feed tank	
41	(DC27)	Zeolite feeder bin	 Particulate emissions shall not exceed 0.023 lb/hr and 0.1 TPY. Opacity of visible emissions shall not equal or exceed 20%.
42	(DC31)	Sod.tri poly phosphate feeder bin	1. Particulate emissions shall not exceed 0.00003 lb/hr and 0.0002 TPY.
			2. Opacity of visible emissions shall not equal or exceed 20%.
43	(DC30)	NaCl feeder bin	1. Particulate emissions shall not exceed 0.0023 lb/hr and 0.01 TPY.
			2. Opacity of visible emissions shall not equal or exceed 20%.
44	(DC7)	CMC Super sack	1. See General Condition 28.
45	(DC34)	CMC feeder bin	1. Particulate emissions shall not exceed 0.0027 lb/hr and 0.012 TPY.

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<u>POINT</u>	OF EMISSION	AFFECTED FACILITY	<u>CONDITIONS</u>
			2. Opacity of visible emissions shall not equal or exceed 20%.
44	(DC7)	Tinopal Super sack	1. See General Condition 28.
46	(DC36)	Tinopal feeder bin	 Particulate emissions shall not exceed 0.0006 lb/hr and 0.0025 TPY. Opacity of visible emissions shall not equal or exceed 20%.
47	(DC23)	Soda ash 100 feeder bin	 Particulate emissions shall not exceed 0.057 lb/hr and 0.251 TPY. Opacity of visible emissions shall not equal or exceed 20%
44	(DC7)	Enzyme Super sack	1. See General Condition 28.
44	(DC7)	Screen	1. See General Condition 28.
44	(DC7)	Elevator #1	1. See General Condition 28.
44	(DC7)	Elevator #3	1. See General Condition 28.
48	(DC2)	Fluid bed Dryer	 Particulate emissions shall not exceed 4.02 lb/hr and 17.625 TPY. Opacity of visible emissions shall not equal or exceed 20%.
44	(DC7)	Screen	1. See General Condition 28.
44	(DC7)	Elevator #4	1. See General Condition 28.
44	(DC7)	Elevator #5	1. See General Condition 28.

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POINT	OF EMISSION	AFFECTED FACILITY	CONDITIONS
44	(DC7)	Elevator #6	1. See General Condition 28.
44	(DC7)	Low suds off quality Collect bin	1. See General Condition 28.
44	(DC7)	Low suds fine Recycle bin	1. See General Condition 28.
VIII. LO	OW-SUDS FINAL PRODUCT	ΓLINE	The production rate of Low-suds product shall not exceed 40,000 lb/hr and 175,720 TPY.
44	(DC7)	Low suds base tank	1. See General Condition 28.
44	(DC7)	Low suds drum mixer	1. See General Condition 28.
44	(DC7)	Elevator #8	1. See General Condition 28.
49	(DC25)	Zeolite day tank	1. Particulate emissions shall not exceed 0.0196 lb/hr and 0.086 TPY.
			2. Opacity of visible emissions shall not equal or exceed 20%.
IX. PAC	CKAGING SECTION		
50	(DC3)	Five (5) Packaging machines	 The total processing rate of the packaging machines shall not exceed 75,000 lb/hr and 328,500 TPY. Particulate emissions shall not exceed 1.413 lb/hr and 6.19 TPY. Opacity of visible emissions shall not equal or exceed 20%.
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POINT OF EMISSION

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AFFECTED FACILITY

CONDITIONS

X. MISCELLANEOUS OPERATIONS:			
51	(DC8-DC11)	Manufacturing Area Fugitive Dust Collection System	 Particulate emissions shall not exceed 1.413 lb/hr and 6.19 TPY. Opacity of visible emissions shall not equal or exceed 20%.
52	(DC12,DC13)	Packaging Area Fugitive Dust Collection System	 Particulate emissions shall not exceed 1.96 lb/hr and 8.6 TPY. Opacity of visible emissions shall not equal or exceed 20%.
XI. MO	LDING OPERATIONS		The processing rate of Polyethylene shall not exceed 2788 lb/hr.
53	(-)	Blow Molding	 Particulate emissions shall not exceed 0.318 lb/hr and 1.393 TPY. Opacity of visible emissions shall not equal or exceed 20%.
54	(-)	Injection Molding	 Particulate emissions shall not exceed 0.0008 lb/hr and 0.0035 TPY. Opacity of visible emissions shall not equal or exceed 20%.

GENERAL CONDITIONS:

- 1. The permittee shall comply with all conditions of this permit. Noncompliance shall be (a) violation(s) of State Regulation 401 KAR 50:035, Permits, Section 4 and Federal Statute 42 USC 7401 through 7671q (the Clean Air Act) and is grounds for an enforcement action including but not limited to the termination, revocation and reissuance, or revision of this permit.
- 2. Any deviations from permit requirements, including those due to upset conditions, shall be promptly reported to the Division's Bowling Green Regional Office. In accordance with State Regulation 401

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GENERAL CONDITIONS:

KAR 50:055, General compliance requirements, Section 1, the reports shall describe the probable cause of the deviations and corrective actions or preventative measures taken.

- 3. This permit shall become null and void after five years following the date of issue. Application for renewal shall be made at least six months prior to the expiration date.
- 4. All records and support information required by State Regulation 401 KAR 50:035, Permits, shall be retained at the source authorized by this permit for a period of five years and shall be made available for inspection upon request by any duly authorized representative of the Division for Air Quality.
- 5. Periodic testing or instrumental or non instrumental monitoring, which may consist of record keeping, shall be performed to the extent necessary to yield reliable data for purposes of demonstration of continuing compliance with the conditions of this permit. For the purpose of demonstration of continuing compliance with the mass emission limits, the following guidelines shall be followed:
 - a) Pursuant to State Regulations 401 KAR 50:012, General application, Section 1(1) and 401 KAR 50:055, General compliance requirements, Section 2(5), all air pollution control equipment and all pollution control measures proposed by the application in response to which this permit is issued shall be in place, calibrated, properly maintained, and in operation according to vendors specifications at any time an affected facility for which the equipment and measures are designed is operated, except as provided by State Regulation 401 KAR 50:055, Section 1.
 - b) All the air pollution control systems shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order for the source to stay below major source thresholds. A log shall be kept of all the routine and non routine maintenances performed on each control device.
 - c) The monthly log of the raw material consumption and production rates shall be kept available at the plant. Compliance with the hourly production rates, material usage rates and emission limits may be demonstrated by computer program (spread sheet), calculations or performance tests as may be specified and requested by the Division.
 - d) For the dust collectors, the log of daily pressure drop readings of incoming and outgoing air shall be maintained.
 - e) For the wet scrubber, a log shall be maintained of pressure drop and water flow rate. Each shall be measured once each shift (twice a day).

PERMIT - Continued

GENERAL CONDITIONS:

- 6. If an applicable requirement of Federal Statute 42 USC 7401 through 7671q (the Clean Air Act) is more stringent than an applicable requirement promulgated pursuant to Federal Statute 42 USC 7651 through 7619 (Title V of the Act), both provisions shall apply, and are both state and federally enforceable.
- 7. Any condition or portion of this permit which becomes suspended or is ruled invalid as a result of any legal or other action shall not invalidate any other portion or condition of this permit.
- 8. The permittee shall not use as defense in an enforcement action, the contention that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance.
- 9. The permit contained herein may be revised, revoked, reopened, reissued, or terminated for cause. The filing of a request by the permittee for any permit revision, revocation, reissuance, or termination, or of a notification of planned changes or anticipated noncompliance shall not stay any permit condition.
- 10. This permit does not convey property rights or exclusive privileges.
- 11. The permittee shall perform compliance certification and record keeping sufficient to assure compliance with the terms and conditions of the permit. Documents, including reports, shall be certified by a responsible official pursuant to State Regulation 401 KAR 50:035, Permits, Section 3(4). The procedures outlined in General Condition 5, shall be followed for the method of compliance demonstration and record keeping.
- 12. The permittee shall furnish to the Division, in writing, information that the Division may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Division, copies of records, reports, and other information required by the permit to be kept.
- 13. This permit shall be subject to suspension at any time the permittee fails to pay all fees within 90 days after notification as specified in State Regulation 401 KAR 50:038, Air emissions fee.
- 14. Except as identified as state-origin permit conditions in this permit, all terms and conditions contained herein shall be enforceable by U.S. EPA and citizens.
- 15. The permittee shall allow the Cabinet or an authorized representative to perform the following:
 - a. Enter upon the premises where a source is located or emissions-related activity is conducted, or where records are kept;
 - b. Have access to and copy, at reasonable times, any records required by the permit:

PERMIT - Continued

GENERAL CONDITIONS:

- 1. During normal office hours, and
- 2. During periods of emergency when prompt access to records is essential to proper assessment by the Cabinet;
- c. Inspect, at reasonable times, any facilities, equipment (including monitoring and pollution control equipment), practices, or operations required by the permit. Reasonable times shall include, but are not limited to the following:
 - 1. During all hours of operation at the source,
 - 2. For all sources operated intermittently, during all hours of operation at the source and the hours between 8:00 a.m. and 4:30 p.m., Monday through Friday, excluding holidays, and
 - 3. During an emergency; and
- d. Sample or monitor, at reasonable times, substances or parameters to assure compliance with the permit or any applicable requirements. Reasonable times shall include, but are not limited to the following:
 - 1. During all hours of operation at the source,
 - 2. For all sources operated intermittently, during all hours of operation at the source and the hours between 8:00 a.m. and 4:30 p.m., Monday through Friday, excluding holidays, and
 - 3. During an emergency.
- 16. Except as provided in State Regulation 401 KAR 50:035, Permits, compliance by the affected facilities listed herein with the conditions of this permit shall be deemed to be compliance with all applicable requirements as of the date of the issuance of this permit.
- 17. Nothing in this permit shall alter or affect the authority of the U.S. EPA to impose emergency orders pursuant to Federal Statute 42 USC 7603, Emergency orders.
- 18. Nothing in this permit shall alter or affect the liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance.
- 19. Nothing in this permit shall alter or affect the authority of U.S. EPA to obtain information pursuant to Federal Statute 42 USC 7414, Inspections, monitoring, and entry.
- 20. Pursuant to State Regulation 401 KAR 50:035, Permits, Section 4(7), an emergency shall constitute an affirmative defense to an action brought for noncompliance with the technology-based emission limitations if the permittee demonstrates through properly signed contemporaneous operating logs or other relevant evidence that:
 - a. An emergency occurred and the permittee can identify the cause of the emergency;
 - b. The permitted facility was at the time being properly operated;

PERMIT - Continued

GENERAL CONDITIONS:

- c. During an emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit; and
- d. The permittee notified the Division as promptly as possible and submitted written notice of the emergency to the Division within two working days after the time when emission limitations were exceeded due to the emergency if the notice met the requirement of State Regulation 401 KAR 50:035, Permits, Section 4(1)(c)3.b., and included a description of the emergency, steps taken to mitigate emissions, and corrective actions taken.
- 21. Emergency provisions listed in General Condition 20 are in addition to any emergency or upset provision contained in an applicable requirement.
- 22. In an enforcement proceeding, the permittee seeking to establish the occurrence of an emergency shall have the burden of proof.
- 23. The permittee shall certify compliance to the Cabinet and if requested, to the U.S. EPA, annually or as otherwise specified in this permit with the terms and conditions contained herein, including emission limitations, standards, and work practices in accordance with the following requirements. The compliance certification shall include the following:
 - a. Identification of each term or condition of the permit that is the basis for the certification;
 - b. Compliance status;
 - c. Whether compliance was continuous or intermittent;
 - d. The method used for determining the compliance status of the source, currently and over the reporting period pursuant to State Regulation 401 KAR 50:035, Permits, Section 4(1)(c); and
 - e. Other facts as the Cabinet may require to determine the compliance status of the source.
- 24. The following throughput rates during any 12 consecutive months shall not be exceeded:

Point of Emission	Affected Facility	Throughput	
		(Gal/yr)	(tons/yr)
06 (03)	30,455 gal Sur.N-85 Storage tank.	6,800,000	29,920

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GENERAL CONDITIONS:

09	(10)	14,100 gal Ether Sulfate Storage tank.	346,360	1,490
10	(15)	14,100 gal SXS-40 Storage tank.	1,281,384	6,196
18	(37)	14,100 gal gly.ether Storage tank.	199,160	743
19	(36)	14,100 gal IPA Storage tank.	199,160	657
20	(-)	14,100 gal Poly Acrylate Storage tank.	960,000	5242

A working log shall be maintained of throughput in tons per month and tons per year. Reports generated from logs shall be used to demonstrate compliance with the specified annual maximum production rates.

- 25. The maximum production rate collectively from the four mixers listed at emission point 21 (28,29,32,35) shall not exceed 38,756.3 lb/hr and 169,753 tons during any 12 consecutive months. A working log shall be maintained of throughput in tons per month and tons per year. Reports generated from logs shall be used to demonstrate compliance with the specified annual maximum production rates and hourly rates (using average hours of operation).
- 26. Visible and particulate emissions as measured by methods referenced in state regulation 401 KAR 50:015, Documents incorporated by reference, section 1, shall not exceed the respective pollutant emission limitations specified herein.
- 27. Particulate emissions from DC6 shall not exceed 0.6245 lb/hr and 2.735 TPY. Opacity of visible emissions shall not equal or exceed 20%.
- 28. Particulate emissions from DC7 shall not exceed 0.6821 lb/hr and 2.9876 TPY. Opacity of visible emissions shall not equal or exceed 20%.
- 29. Particulate emissions from WS1 shall not exceed 5.779 lb/hr and 25.31 TPY. Opacity of visible emissions shall not equal or exceed 20%. SO₂ emissions shall not exceed 0.5 lb/mm BTU and 54.8 TPY.

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GENERAL CONDITIONS:				
30. The Division for Air Quality has determined that this source's potential to emit any air pollutant will be less than 100 tons per year due to the limitation of processing rates and requirements to operate and maintain air pollution control devices.				
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